IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

SHARP SHIRTER, INC.,

Plaintiff,

v.

THE PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED IN SCHEDULE A,

Defendants.

Case No. 24-cv-1319

Judge Elaine E. Bucklo Magistrate Judge

STIPULATION AND [PROPOSED] ORDER MODIFYING PRELIMINARY INJUNCTION ORDER AS TO CERTAIN DEFENDANTS

WHEREAS, the Court entered a Temporary Restraining Order ("TRO") (Dkt. 8) on March 27, 2024 freezing the accounts of Defendants DOE #20 d/b/a "Adicreat", DOE #25 d/b/a "NEWISTAR" (Seller ID: A2OAVLPC5I6WZX), DOE #31 d/b/a "Blueplus", DOE #34 d/b/a "Sunidoor", DOE #39 d/b/a "Aflycatus", and DOE #45 d/b/a "Belovedtee" (collectively, "Defendants") and providing additional relief to Plaintiff, Sharp Shirter, Inc., (individually, "Sharp Shirter;" with Defendants, the "Parties");

WHEREAS, on April 15, 2024, the Court extended the TRO until April 24, 2024 (Dkt. 15)
WHEREAS, on April 15, 2024, Defendants filed a Request for Hearing on the Ex Parte
TRO extension to address the validity and scope of the TRO (Dkt. 16);

WHEREAS, the Parties have since discussed the validity and scope of the TRO and have agreed that the TRO and subsequent extension is valid and proper;

WHEREAS, the Parties have now agreed to the below modification as to the amount restrained under the terms of the TRO Order (Dkt. 9) out of an effort to compromise;

WHEREAS, the Defendants' Request for Hearing (Dkt. 16) is now withdrawn;

IT IS HEREBY STIPULATED AND AGREED by and between the Parties and subject to the approval of the Court, that the TRO Order (Dkt. 9), and subsequent Preliminary Injunction that may allow for continued asset restraint, if any, be modified as follows:

The quantum of funds frozen as it relates to Defendant DOE #20 d/b/a "Adicreat" (Seller ID: A2F1JYFC2B4EC0) shall be limited to twenty three thousand United States dollars (\$23,000.00).

The quantum of funds frozen as it relates to Defendant DOE #25 d/b/a "NEWISTAR" (Seller ID: A2OAVLPC5I6WZX) shall be limited to seven thousand United States dollars (\$7,000.00).

The quantum of funds frozen as it relates to Defendant DOE #31 d/b/a "Blueplus" (Seller ID: A2PZHHKM7EMWNL) shall be limited to thirty thousand United States dollars (\$30,000.00).

The quantum of funds frozen as it relates to Defendant DOE #34 d/b/a "Sunidoor" (Seller ID: A3I3300BNHT4BV) shall be limited to thirty eight thousand United States dollars (\$38,000.00).

The quantum of funds frozen as it relates to Defendant DOE #39 d/b/a "Aflycactus" (Seller ID: A18OBFTIZSM6IS) shall be limited to thirteen thousand United States dollars (\$13,000.00).

The quantum of funds frozen as it related to Defendant DOE #45 d/b/a "Belovedtee" (Seller ID: A1IIBXEZNFWZ2W) shall be limited to thirty two thousand United States dollars (\$32,000.00).

Stipulated to:	
Date: April 19, 2024	/s/ Mackenzie Paladino Mackenzie Paladino, Esq. (Bar No. 6342560) DONIGER / BURROUGHS 247 Water Street, First Floor New York, New York 10038 mpaladino@donigerlawfirm.com (310) 590-1820 Attorneys for Plaintiff
Date: April 19, 2024	/s/ David Silver David Silver, Esq. Bayramoglu Law Offices, LLC 1540 West Warm Springs Road, Suite 100 Henderson, Nevada 89014 david@bayramoglu-legal.com (702) 462-5973 Attorney for Defendants
DATED:	SO ORDERED:
	Elaine E. Bucklo United States District Judge